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Attorney for Plaintiffs Martha Kimes and Dennis Fitzgerald

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MARTHA KIMES and DENNIS  
FITZGERALD,

## Plaintiffs.

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CARLOS SOLORZANO, individually and  
dba Carlos' Country Kitchen, et al.,

## Defendants.

Case No.: 4:19-cv-05641-DMR

## **STIPULATION OF DISMISSAL**

*Before the Hon. Donna M. Rvu*

The parties, through the signatures of their counsel on this Stipulation, stipulate to dismiss this action with prejudice as to Defendants Carlos Solorzano and Karen Solorzano, individually and dba Carlos' Country Kitchen only pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii). The Parties agree that they shall each bear their own attorneys' fees and costs and that the Court shall retain jurisdiction to enforce the terms of their settlement.

IT IS SO STIPULATED.

1 Dated: December 3, 2020

ACCESSIBLE CALIFORNIA, APC

2 /s/ *Khushpreet R. Mehton*

3 Khushpreet R. Mehton, Esq.

4 Attorney for Plaintiffs Martha Kimes and Dennis Fitzgerald

5 Dated: December 3, 2020

6 BLUESTONE ZUNINO & HAMILTON, LLP

7 /s/ *Marshall E. Bluestone*

8 Marshall E. Bluestone, Esq.

9 Attorney for Defendants Carlos Solorzano, individually  
10 and dba Carlos' Country Kitchen and Karen Solorzano,  
11 individually and dba Carlos' Country Kitchen

12 **SIGNATURE ATTESTATION**

13 I hereby attest that all signatories listed above, on whose behalf this stipulation is  
14 submitted, concur in the filing's content and have authorized the filing.

15 Dated: December 3, 2020

16 ACCESSIBLE CALIFORNIA, APC

17 /s/ *Khushpreet R. Mehton*

18 Khushpreet R. Mehton, Esq.

19 Attorney for Plaintiffs Martha Kimes and Dennis Fitzgerald

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2 ~~[PROPOSED]~~ ORDER  
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4 IT IS ORDERED that:

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1. This matter is dismissed with prejudice as to Defendants Carlos Solorzano, individually and dba Carlos' Country Kitchen and Karen Solorzano, individually and dba Carlos' Country Kitchen only as Defendants in this Action;
2. The dismissal is expressly conditioned on the terms and conditions of the parties' settlement of this matter;
3. The Court retains jurisdiction of this matter for the purposes of taking any action needed to enforce the terms of the parties' settlement; and
4. Each party is to bear its own costs, as provided for in this Settlement Agreement.

15 Dated: January 4, 2021

